

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|   |   |                         |
|---|---|-------------------------|
| TRUSTEES OF THE GLAZIERS, ARCHITECTURAL         | ) |                         |
| METAL AND GLASS WORKERS LOCAL UNION NO.         | ) |                         |
| 27 WELFARE AND PENSION FUNDS,                   | ) |                         |
|   | ) | Case No. 07-cv-6429     |
| Plaintiffs,                                     | ) |                         |
|   | ) | Judge Bucklo            |
| v.  | ) |                         |
|   | ) | Magistrate Judge Ashman |
| WORLD CLASS GLASS CO., an Illinois corporation; | ) |                         |
| and RICHARD MORRISON, individually              | ) |                         |
|   | ) |                         |
| Defendant.                                      | ) |                         |

**MOTION FOR ORDER OF DEFAULT AND JUDGMENT IN SUM CERTAIN**

Plaintiffs, by one of their attorneys, SHANE LUEDKE and ARNOLD AND KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order of Default as to liability and Judgment in favor of Plaintiffs and against Defendants, WORLD CLASS GLASS CO., an Illinois corporation and RICHARD MORRISON, individually. In support thereof, Plaintiffs state:

1. This case was filed on November 6, 2007.
2. Defendants were served with Summons and Complaint on November 16, 2007.
3. In excess of 20 days have expired since Service of Process, however, Defendants have failed to file an answer or otherwise plead.
4. Plaintiffs have expended \$ in attorneys fees and cost in pursuit of this matter

**COUNT I**

5. The audits of World Class Glass performed by Richard Wolf and Company, Inc., revealed that Defendant, World Class Glass, owes \$3,305.68 to the Plaintiffs, which includes liquidated damages and audit costs, as indicated in the audits. (Exhibit A)

**COUNT II**

6. Defendants, WORLD CLASS GLASS CO., an Illinois corporation and RICHARD MORRISON, individually, entered into an Installment Note Agreement.

7. Per the affidavit of Olga Kane, attached as Exhibit D, Defendants have missed installment note payments for months March 2008 to June 2008, resulting in the remaining note balance of \$5,859.80 to be accelerated to fully due and owing to Plaintiffs. (Exhibits B, C, and D)

**RELEVANT TO COUNTS I AND II**

8. Per the affidavit of Shane Luedke, attorney for Plaintiffs, a total of \$10,896.00 in legal fees and expenses have been incurred in this suit. (Exhibit E)

**WHEREFORE**, Plaintiffs pray for:

1. An Order of Default and Judgment against the Defendants.
2. Judgment against Defendant, WORLD CLASS GLASS CO., under the audit for \$3,305.68.
3. Judgment against Defendants, WORLD CLASS GLASS CO. and RICHARD MORRISON, for the accelerated Note amount for \$5,859.80.
4. Judgment against Defendants, WORLD CLASS GLASS CO. and RICHARD MORRISON, for the legal fees and cost incurred by Plaintiffs in pursuit of this matter for \$10,896.00.

Respectfully submitted,

TRUSTEES OF THE GLAZIERS, ARCHITECTURAL  
METAL AND GLASS WORKERS LOCAL UNION NO.  
27 WELFARE AND PENSION FUNDS

s/ Shane Luedke  
Counsel for Plaintiffs

Donald D. Schwartz  
Shane Luedke  
**ARNOLD AND KADJAN**  
19 West Jackson Blvd.  
Chicago, Illinois 60604  
(312) 236-0415